

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ALBERT MUJAJ,

Defendant.

**INDICTMENT**

25 Cr.

**25 CRIM**

**084**

**COUNT ONE**  
**(Bank Fraud)**

The Grand Jury charges:

1. From at least in or about July 2022 through at least in or about August 2022, in the Southern District of New York and elsewhere, ALBERT MUJAJ, the defendant, knowingly executed, and attempted to execute, a scheme and artifice to defraud a financial institution, as that term is defined in Title 18, United States Code, Section 20, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such a financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, MUJAJ engaged in a scheme to obtain, by means of false and fraudulent pretenses, representations, and documents, funds from a stolen check deposited into a bank account with a financial institution.

(Title 18, United States Code, Sections 1344 and 2.)

**COUNT TWO**  
**(Aggravated Identity Theft)**

The Grand Jury further charges:

2. From at least in or about July 2022 through at least in or about August 2022, in the Southern District of New York and elsewhere, ALBERT MUJAJ, the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another

person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, MUJAJ used and transferred the name, address and other personal information of a victim during and in relation to the bank fraud charged in Count One of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.)

**FORFEITURE ALLEGATION**

3. As a result of committing the offense alleged in Count One of this Indictment, ALBERT MUJAJ, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting, or derived from, proceeds obtained directly or indirectly, as a result of the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

4. As a result of committing the offense alleged in Count Two of this Indictment, ALBERT MUJAJ, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1028(b), any and all property constituting, or derived from, proceeds obtained directly or indirectly as a result of said offense and any and all personal property used or intended to be used to commit said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

**Substitute Assets Provision**

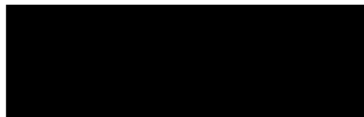
5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;

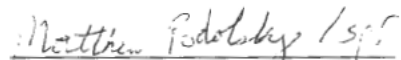
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982, 1028;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)



FOREPERSON

  
MATTHEW PODOLSKY  
Acting United States Attorney